

CV 17-6989

ORIGINAL

COGAN, J.

NEW YORK:

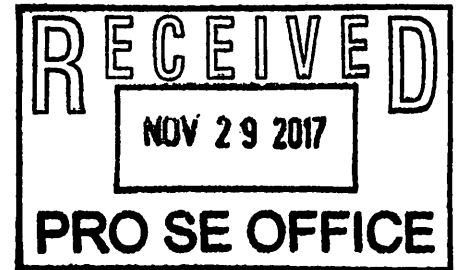
IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK

DONALD SMITH,
PLAINTIFF

V

ACTION NO:

SPECTRUM BRANDS INC.,
REMINGTON
DEFENDANTS



"PLAINTIFF IS OWNER OF PRODUCT IDEA"

Donald Smith, Plaintiff Pro Se, file this petition against Spectrum Brands (NYSE (SPB)) and its subsidiary Remington the Defendants.

There were no discussions between Plaintiff and Defendants. Plaintiff, did not consider Remington to develop Plaintiff's product idea "The magic wand." Remington in the Plaintiff's mind in 2006 were suppliers of electric shavers.

The theft of Plaintiff's product idea "theft of trade secret" occurred may 2006.

As of March 29, 2004 Remington Products Co. LLC was acquired by Spectrum Brands, INC. Remington Products Co. LLC, engages in the development and marketing of personal care products. Its products comprise electrical shavers and


Sells its products through mass merchandisers, and drug stores.

It is reported SPB total assets in 2016 are \$7.1 Billion.

The Plaintiff, does perceive the product(s) temperature displayed in its advertisements and packaging, as threats. If a connection is revealed between the Defendants and anyone connected to the Plaintiff, then the components might add up to RICO. At this point Plaintiff, has a burden of proof to prove the Defendants erroneously acquired the Plaintiff's product idea. Plaintiff purchased a Remington model CI-95AC7 in a local thrift store.

Shortly thereafter Plaintiff began to research Remington. If the Plaintiff claims a sum sufficient to satisfy the statutory requirements a federal court may dismiss only if it is apparent, to a legal certainty that Plaintiff cannot recover the amount claimed. Plaintiff seeks \$100 million relief.

Prepared and Submitted by

 11/24/17

Donald Smith
618 W 27TH ST.
Norfolk, VA 23517
757-275-6904

ADDRESSES

PLAINTIFF

Donald Smith
618 W 27TH ST
Norfolk, VA 23517
757-275-6904

Defendants

HRG GROUP INC., for
Spectrum Brand
Remington
450 Park Ave FL 29
NY, NY 10022

Donald Smith,

Donald Smith
618 W 27TH ST
Norfolk, VA 23517
757-375-6904

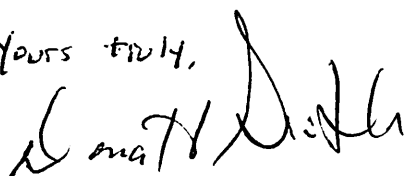
Date 11/24/17

Clerk of the District COURT
Eastern District of New York - Brooklyn
225 Cadman Plaza East
Brooklyn, NY 11201

Dear Clerk of the Court,

I am respectfully submitting the attached petition to be filed.
Thank you for your time and attention.

Yours truly,



Donald Smith
Plaintiff Pro Se

